



1 November 2021

RET and Energy Section  
Clean Energy Regulator  
GPO Box 621  
Canberra ACT 2601

Submitted via email: [CER-CERT@cer.gov.au](mailto:CER-CERT@cer.gov.au)

## **CORPORATE EMISSIONS REDUCTION TRANSPARENCY REPORT**

Alinta Energy appreciates the opportunity to provide feedback on the proposed Corporate Emissions Reduction Transparency report guidelines and commends the CER team on their consultation throughout the design phase.

Alinta Energy raises the following issues and suggested solutions for the CER's further consideration.

### **Accurate Residual Mix Factors**

Alinta Energy is concerned that the proposal to use Climate Active's national Residual Mix Factor in calculating participants' market-based scope 2 emissions would:

- create arbitrary 'winners' and 'losers'. Participants in states with relatively lower residual mix factors would over-report their emissions, while others would under-report their emissions.
- prevent off-grid participants from accurately reporting their scope 2 emissions reductions.

To avoid these outcomes, Alinta Energy suggests that mix factors should be calculated for each state, and that off-grid participants be permitted to use mix factors provided by their suppliers.

Further, Alinta Energy considers that using the national Residual Mix Factor before adopting more accurate mix factors, would cause arbitrary fluctuations in participants' reported emissions. To avoid this, Alinta Energy recommends that the CERT report omits the market-based scope 2 emissions calculations until it enables participants to use more accurate mix factors.

### **'Progress verified' emissions intensity targets**

Alinta Energy considers that, in time, as the CERT report evolves, emissions intensity targets could become 'progress verified' commitments, considering that the data required to verify these targets is contained within the NGER Scheme.

### **'Progress verified' targets for grouped subsidiaries**

Alinta Energy also considers that as the CERT report evolves, targets for grouped subsidiaries could become 'progress verified' commitments. This applies where a subsidiary under which Group Members lie, lies between the 'Controlling Corporation' and the 'Group Member' levels, and where all Group Members are reported under NGER so the relevant underlying data is verifiable.

### **LGCs and eligible units**

Alinta Energy considers that including LGCs in a company's 'share of eligible units' on the dashboard would be misleading, noting that an LGC does not represent the same level of emissions abatement as offsets like ACCUs.

Thank you for your consideration of Alinta Energy's submission. If you would like to discuss this in more detail, please contact Oscar Carlberg at [oscar.carlberg@alintaenergy.com.au](mailto:oscar.carlberg@alintaenergy.com.au) or on 0409 501 570.

Yours sincerely,



**Mike Searles**

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